

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

GEOTAB INC. AND GEOTAB USA, INC.,  
Petitioners,

v.

FRACTUS, S.A.  
Patent Owner.

---

Case No. IPR2025-01027  
Patent No. 11,349,200

---

**PETITIONERS' MOTION TO ACCEPT LATE SUBMISSION OF  
PETITIONERS' REPLY TO PATENT OWNER'S  
PRELIMINARY RESPONSE**

## **I. STATEMENT OF RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.5(c)(3), Petitioners, Geotab Inc. and Geotab USA, Inc. (“Petitioners”), respectfully request that the Board accept the timely submission of Petitioners’ Reply to Patent Owner’s Preliminary Response as electronic filing via P-TACTS was unavailable on October 23, 2025. Consideration of the Reply on the merits is in the interests of justice because the Board authorized Petitioners filing this Reply as stated in EX3001 and there is no prejudice to Patent Owner because they were timely served with the Reply by email on October 23, 2025.

## **II. REASONS SHOWING GOOD CAUSE FOR REQUESTED RELIEF**

37 C.F.R. § 42.5 states that “a late action will be excused on a showing of good cause or upon a Board decision that consideration on the merits would be in the interests of justice.” The Office’s web site explains that “if P-TACTS is unavailable, parties may notify the Board of the service of petitions and/or other associated documents by email, copying opposing counsel, at [Trials@uspto.gov](mailto:Trials@uspto.gov).” See FAQ A6 at [https://www.uspto.gov/sites/default/files/documents/p\\_tacts\\_faqs\\_20250428.pdf](https://www.uspto.gov/sites/default/files/documents/p_tacts_faqs_20250428.pdf).

Petitioners attempted to timely file Petitioners’ Reply to Patent Owner’s Preliminary Response on the due date of October 23, 2025, as authorized by the Board Email dated October 20, 2025 (*see* EX3001), and found P-TACTS to be

unavailable for electronic filing. On the afternoon of October 23, 2025, at approximately 4:15PM EDT, counsel for Petitioners attempted to upload Petitioners' Reply to Patent Owner's Preliminary Response to the P-TACTS filing system but received an error notification. Petitioners continued to attempt to upload to the P-TACTS filing system until approximately 5:45PM EDT and continued encountering the same upload error notifications. Shortly thereafter, Petitioners then proceeded in accordance with the alternative filing procedure set forth in A6 of the P-TACTS FAQ available at [https://www.uspto.gov/sites/default/files/documents/p\\_tacts\\_faqs\\_20250428.pdf](https://www.uspto.gov/sites/default/files/documents/p_tacts_faqs_20250428.pdf). Petitioners timely served opposing counsel via email (*see* Attachment A), wherein the email attached a copy of Petitioners' Reply to Patent Owner's Preliminary Response, and Petitioners subsequently notified the Board of the service by email (*see* Attachment B). Petitioners thereafter attempted to file the Reply to Patent Owner's Preliminary Response using P-TACTS again at 9:29PM EDT and received the same upload error notifications.

Given the unavailability of P-TACTS for Petitioners' timely filing of Petitioners' Reply to Patent Owner's Preliminary Response, good cause exists to accept the late submission. Counsel for Patent Owner, Fractus, S.A. ("Patent Owner"), was timely served via email with a copy of Petitioners' Reply to Patent Owner's Preliminary Response on October 23, 2025. Thus, Patent Owner will not

be prejudiced by the Board's acceptance of Petitioners' late submission, and Petitioners believe that granting this motion will not hinder the economy, the integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding. *See* 35 U.S.C. § 316(b).

### **III. CONCLUSION**

For the foregoing reasons, Petitioners respectfully request that the Board accept Petitioners' Reply to Patent Owner's Preliminary Response as timely and accord it a filing date of October 23, 2025.

Respectfully submitted,  
*Geotab Inc. and Geotab USA, Inc.*

Date: October 24, 2025

By: /Adam R. Wichman/  
Adam R. Wichman, Reg. No. 43,988  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210

**CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)**

I certify that on October 24, 2025, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

Mark J. DeBoy	<a href="mailto:mdeboy@esfip.com">mdeboy@esfip.com</a>
Patrick Finnan	<a href="mailto:pfinnan@esfip.com">pfinnan@esfip.com</a>
Larry Shatzer	<a href="mailto:lshatzer@esfip.com">lshatzer@esfip.com</a>
	<a href="mailto:Fractus_GeoTab_IPRs@esfip.com">Fractus_GeoTab_IPRs@esfip.com</a>

Date: October 24, 2025

/Dara Del Rosario/  
Dara Del Rosario  
Paralegal  
WOLF, GREENFIELD & SACKS, P.C.

# Attachment A

## Del Rosario, Dara

---

**From:** Del Rosario, Dara  
**Sent:** Thursday, October 23, 2025 5:53 PM  
**To:** 'Mark J. DeBoy'; 'Patrick Finnan'; 'Larry Shatzer'; 'Fractus\_GeoTab\_IPRs@esfip.com'  
**Cc:** PTAB Adam Wichman; PTAB Michael Parsons; PTAB Rich Giunta; PTAB Simon Lu  
**Subject:** IPR2025-01026 and -01027: Petitioners' Reply to Patent Owner's Preliminary Response  
**Attachments:** IPR2025-01026 - '677 Petitioners' Reply to POPR.pdf; IPR2025-01027 - '200 Petitioners' Reply to POPR.pdf

RE: Geotab Inc. et al. v. Fractus, S.A.  
Case Nos. IPR2025-01026 and -01027

Dear Counsel,

Attached for service, please find copies of Petitioners' Reply to Patent Owner's Preliminary Response for the above-captioned matters.

Please note that we are receiving error messages while attempting to upload the documents to P-TACTS and are currently unable to file the papers with the Patent Trial and Appeal Board. We will notify the Board via email (copying counsel for Patent Owner) that the Petitioners' Reply to Patent Owner's Preliminary Response for the above-captioned matters were timely served upon counsel for Patent Owner and we will submit the papers, along with a Motion to Accept Late Submission, to P-TACTS upon availability.

If you have any questions or concerns, please do not hesitate to contact us.

Sincerely,  
Dara Del Rosario



**Dara Del Rosario**

Post Grant Paralegal

[dara.delrosario@wolfgreenfield.com](mailto:dara.delrosario@wolfgreenfield.com)

202.240.9238

**Wolf, Greenfield & Sacks, P.C.**

BOSTON | NEW YORK | WASHINGTON DC

[wolfgreenfield.com](http://wolfgreenfield.com) | [LinkedIn](#)

*This e-mail message and any attachments may contain confidential or privileged information. If you are not the intended recipient, please notify me immediately by replying to this message. Please destroy all copies of this message and any attachments. Thank you.*

# Attachment B

## Del Rosario, Dara

---

**From:** Wichman, Adam R.  
**Sent:** Thursday, October 23, 2025 6:19 PM  
**To:** Trials  
**Cc:** PTAB Adam Wichman; PTAB Michael Parsons; PTAB Rich Giunta; PTAB Simon Lu; Mark J. DeBoy; Patrick Finnan; Larry Shatzer  
**Subject:** Geotab Inc. and Geotab USA, Inc. v. Fractus, S.A., IPR2025-01026 and IPR2025-01027 | Notification of Service of Reply to POPR

To the Board:

Please be informed that we received an error message while attempting to upload *Petitioners' Reply to Patent Owner's Preliminary Response* for filing via P-TACTS in each of above-captioned proceedings today. As we were unable to submit the papers via P-TACTS, we timely served each paper on Counsel for Patent Owner via email on October 23, 2025.

We will file the *Petitioners' Reply to Patent Owner's Preliminary Response* in each above captioned proceeding, along with a Motion to Accept Late Submission, if necessary, once the P-TACTS system is available.

Respectfully submitted,

Adam R. Wichman  
Counsel for Petitioners



**Adam R. Wichman, Ph.D.**

**Shareholder**

*Admitted to Practice:* Massachusetts, California

[adam.wichman@wolfgreenfield.com](mailto:adam.wichman@wolfgreenfield.com)

O: 617.646.8571 | C: 617.459.3648

**Wolf, Greenfield & Sacks, P.C.**

BOSTON | NEW YORK | WASHINGTON DC

[wolfgreenfield.com](http://wolfgreenfield.com) | [LinkedIn](#)

*This e-mail message and any attachments may contain confidential or privileged information. If you are not the intended recipient, please notify me immediately by replying to this message, and destroy all copies of this message and any attachments. Thank you.*